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Ticona

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MAY 31 2012

Air/Toxics & Inspection Coordination Branch 6EN-A

Bishop Facility
Highway 77 South
P.O. Box 428
Bishop, TX 78343

May 29, 2012
EIJ-038-12
TPI Project – 07082011-MISC

Certified Mail
7010 0780 0000 1770 0509

Mr. David Eppler
Air Toxics and Inspection Coordination Branch
U.S.EPA Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

Subject: **Clean Air Act ("CAA") Section 114 Information Request – Supplemental Monthly Response**

Dear Mr. Eppler,

As agreed to in our meeting on December 20, 2011, Ticona Polymers, Inc. (TPI) is submitting the following update relating to the EPA's Section 114 Information Request. The team continues to work diligently on this project and will provide the next update by June 18, 2012.

Since the May 7th report, TPI has been analyzing the MO-3 & 4 flare hydraulics data. This helped in understanding the current situation, and what the required changes need to be in order to obtain the required Btu value. These calculations give a better understanding of a bottleneck in terms of pressure drop. As a result, changes can now be made in order to increase the flow thus increasing the Btu value.

The second thing that has been looked at, is the Btu calculations with regards to fuel sample analysis. This sample data takes the results of the MO-4 and MO-3 vents and calculates the Btu value at high operating rates. These samples were collected during a peak of high operating rates, as this would provide the worst case operating scenario. Higher operating rates will require more natural gas in order to achieve the higher Btu value. These calculations showed were we can decrease the pressure drop in order to increase natural gas flow appropriately.

Historical vent gas sample data has been request from our process chemist. We plan to focus on the hydrogen concentration of the stream and evaluate the appropriate heating value. This will enable us to calculate an exact amount of natural gas required to obtain 300but/scf.

The analysis of the minimum and maximum flow scenarios will help determine whether or not we need to resize the natural gas regulator at the break down station. Our current path forward should deliver the appropriate piping and valve configuration by the end of the next reporting period.

Should you have any questions or need additional information, please contact me at (361) 584-6104.

Sincerely,

Buddy Joyner
Sr. Environmental Specialist II

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